

**UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT**

UNITES STATES OF AMERICA,

Plaintiff-Appellee,

v.

EGHOSASERE AVBORAYE-
IGBINEDION,

Defendant-Appellant.

Case No. 23-4600

**UNOPPOSED MOTION TO RECONSIDER LEAVE TO EXCEED
JOINT APPENDIX LENGTH LIMITATIONS**

Defendant-Appellant Eghosasere Avboraye-Igbinedion, by and through undersigned counsel, and with the consent of the counsel for Plaintiff-Appellee, the United States, move for the entry of an Order granting leave for Defendant-Appellant to file an oversized joint appendix for the following reasons:

1. The Joint Appendix, including entries by both sides is 1,149 pages. Pursuant to Local Rule 32(a), it exceeds the 500-page limit.
2. The transcripts include 6 volumes of trial testimony, opening & closing arguments, totaling 945 pages. Additionally, the sentencing hearing transcript, required documents, various other pleadings and exhibits were also included.

3. Defendant-Appellant coordinated with Plaintiff-Appellee to agree upon the contents of the joint appendix. In order to contain the contents required by Federal Rule of Appellate Procedure 30(a)(1) and Local Rule 30(b) and provide a useful reference for the Court and the parties, the joint appendix must exceed Local Rule 32(a)'s 500-page limit for reimbursement of copy expenses for a joint appendix in a court-appointed case.
4. Pursuant to Local Rule 27(a), counsel for Plaintiff-Appellee the United States, has been notified of this motion and consents to the relief requested herein.
5. Accordingly, for the foregoing reasons, Defendant-Appellant respectfully request leave to file an oversized joint appendix, of 1,149 pages.

Respectfully submitted,

Alfred Guillaume

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CERTIFICATE OF SERVICE

I hereby certify that on February 14, 2024, the foregoing Unopposed Motion to Reconsider Leave to Exceed Joint Appendix Length Limitations, were served electronically on counsel of record by the Court's CM/ECF system.

Alfred Guillaume

Alfred Guillaume III, Esq.